

October 18, 2013

Water Docket, U.S.  
Environmental Protection Agency, Mail Code 2822T  
Attn: Docket ID No. EPA-HQ-OW-2010-0824  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Re: Comments on EPA's Preliminary 2012 Effluent Guidelines Program Plan and 2011 Annual Effluent Guidelines Plan, Docket ID No. EPA-HQ-OW-2010-0824

Citation Oil & Gas Corp. (COGC), appreciates this opportunity to submit comments to the Environmental Protection Agency's (EPA) Preliminary 2012 Effluent Guidelines Program Plan and 2011 Annual Effluent Guidelines Plan. COGC supports EPA in delisting the Coalbed Methane (CBM) Extraction subcategory from the effluent guidelines plan.

Since 2007, industry has supplied CBM data for various EPA surveys and reviews as referenced in the proposed 2012 Effluent Guidelines Plan. This information demonstrated that the CBM industry has declined since the original surveys conducted by EPA. The *Economic Analysis for Existing and New Projects in the Coalbed Methane Industry* report published by EPA on July 29, 2013 correctly concludes that many CBM projects are no longer economically feasible considering current declines in natural gas prices. The economic review of various treatment technologies demonstrates that additional technology costs would further reduce feasibility of existing and future projects.

As a representative of the oil and gas industry, COGC appreciates and supports the delisting of the CBM Extraction subcategory in EPA's Preliminary 2012 Effluent Guidelines Program Plan.

Sincerely,

Bob Christofferson  
Rocky Mountain Region Manager  
Citation Oil & Gas Corp.